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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 CARPENTERS HEALTH AND SECURITY  
10 TRUST OF WESTERN WASHINGTON;  
11 CARPENTERS RETIREMENT TRUST OF  
12 WESTERN WASHINGTON; CARPENTERS-  
EMPLOYERS VACATION TRUST OF  
WESTERN WASHINGTON; and  
CARPENTERS-EMPLOYERS  
APPRENTICESHIP AND TRAINING TRUST  
OF WESTERN WASHINGTON,

13 Plaintiffs,

14 v.

15 BEST QUALITY SIDING, LLC, a Washington  
16 limited liability company; and CARMEN  
KUCINSKI, an individual,

17 Defendants.

Cause No. 17-cv-1645 RSM

STIPULATION REQUESTING  
AMENDED CASE SCHEDULING  
ORDER, STRIKING ORDER OF  
DEFAULT, AND STRIKING  
MOTION FOR LEAVE TO  
WITHDRAW AND SUBSTITUTE

18 **I. STIPULATION**

19 Plaintiffs, commonly known as the Carpenters Trusts of Western Washington, through  
20 their counsel Jeffrey G. Maxwell, Esq. and McKenzie Rothwell Barlow & Coughran, P.S.;  
21 and Defendants Best Quality Siding, LLC (“BQS”) and Carmen Kucinski, through their  
22 counsel Judd H. Lees, Esq. and Sebris Busto James, because of the default of Defendant BQS  
and the recent appearance of counsel for the Defendants (Dkt. #12), stipulate to the following:

1           1.       The Parties request amendment of the Court's November 16, 2017 *Order*  
2 *Regarding Initial Disclosures, Joint Status Report, and Early Settlement* (Dkt. #3) to afford  
3 the Parties time to comply with the FRCP and Joint Status Report requirements;

4           2.       The Parties request the Court strike its December 19, 2017 *Order of Default*  
5 *against Defendant Best Quality Siding, LLC* (Dkt. #9);

6           3.       The Parties stipulate that Defendant BQS has 21 days from the date of the  
7 Court's order on this stipulation to answer the Complaint;

8           4.       The Parties request the Court strike the Carpenters Trusts' January 3, 2018  
9 *Motion for Leave to Withdraw and Substitute Counsel for Plaintiffs* (Dkt. ##10, 10-1, 11);  
10 and

11          5.       Defendants stipulate to the withdrawal of Jeffrey G. Maxwell, Esq. and Ekman  
12 Cushing Maxwell, P.S. and the substitution of Jeffrey G. Maxwell, Esq. and McKenzie  
13 Rothwell Barlow & Coughran, P.S. as counsel for the Carpenters Trusts.

14          Dated: January 5, 2018.

15                   s/ Jeffrey G. Maxwell

16                   Jeffrey G. Maxwell, WSBA #33503  
17                   McKENZIE ROTHWELL BARLOW  
18                   & COUGHRAN, P.S.  
19                   1325 Fourth Avenue, Suite 910  
20                   Seattle, Washington 98101  
21                   (206) 224-9900  
22                   [jeffreym@mrbclaw.com](mailto:jeffreym@mrbclaw.com)

Counsel for the Plaintiff Carpenters Trusts of  
Western Washington

1 Dated: January 4, 2018.

2 s/ Judd H. Lees (email authorization) \_\_\_\_\_

3 Judd H. Lees, WSBA #10673

4 Sebris Busto James

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Bellevue, Washington 98006

(425) 454-4223

5 [jlees@sebrisbusto.com](mailto:jlees@sebrisbusto.com)

6 Counsel for Defendants Best Quality Siding,  
7 LLC and Carmen Kucinski

8 **II. ORDER**

9 This matter is before the Court on the Parties' stipulation. The Court has considered  
10 the stipulation as well as the pleadings, court files, and records in this matter and ORDERS:

- 11 1. The Parties request for amendment of the Court's November 16, 2017 *Order*  
12 *Regarding Initial Disclosures, Joint Status Report, and Early Settlement* (Dkt.  
#3) is granted; the Court will issue new deadlines;
- 13 2. The December 19, 2017 *Order of Default against Defendant Best Quality*  
14 *Siding, LLC* (Dkt. #9) is vacated;
- 15 3. Defendant Best Quality Siding, LLC is ordered to file and serve its answer to  
the Complaint (Dkt. #1) within 21 days of the date of this order;
- 16 4. The Carpenters Trusts' *Motion for Leave to Withdraw and Substitute Counsel*  
17 *for Plaintiffs* (Dkt. ##10, 10-1, 11) is stricken; and
- 18 5. Ekman Cushing Maxwell, P.S. has leave to withdraw and McKenzie Rothwell  
19 Barlow & Coughran, P.S. has leave to substitute, with Jeffrey G. Maxwell  
20 remaining as counsel for the Carpenters Trusts.

19 Dated: January 8, 2018.

21 

22 RICARDO S. MARTINEZ

CHIEF UNITED STATES DISTRICT JUDGE